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IN THE UNITED STATES DISTRICT COURT CLERK, U.S. DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION DEPUTY CLERK

UNITED STATES OF AMERICA) CRIMINAL NO. 115-808M
Plaintiff,) <u>INFORMATION</u>) [Count One: 38 C.F.R. § 1.218(a)(13) –
V.) Possession of Loaded Firearm at VA) Facility
LUIS G. FIGUEROA) Count Two: 38 C.F.R. § 1.218(a)(13) –) Possession of Loaded Firearm at VA
Defendant.	 Facility Count Three: 38 C.F.R. § 1.218(a)(13) – Possession of Loaded Firearm at VA Facility Count Four: 38 C.F.R. § 1.218(a)(13) – Possession of Loaded Firearm at VA Facility Count Five: 18 U.S.C. § 7(3) & 13 and T.P.C. § 37.08 – False Report to Law Enforcement]

THE UNITED STATES ATTORNEY CHARGES:

<u>COUNT ONE</u> [38 C.F.R. § 1.218(a)(13)]

On or about May 28, 2015, at the Department of Veterans Affairs Central Texas Health Care Facility, Western District of Texas, the Defendant,

LUIS G. FIGUEROA

did, carry a firearm, to wit: a Glock Model 35, .40 caliber, serial number KCS093, without having an official purpose, in violation of Title 38, Code of Federal Regulations, Section 1.218(a)(13).

COUNT TWO [38 C.F.R. § 1.218(a)(13)]

On or about May 28, 2015, at the Department of Veterans Affairs Central Texas Health Care Facility, Western District of Texas, the Defendant,

LUIS G. FIGUEROA

did, carry a firearm, to wit: a Glock Model 22, .40 caliber, serial number EWH165, without having an official purpose, in violation of Title 38, Code of Federal Regulations, Section 1.218(a)(13).

COUNT THREE [38 C.F.R. § 1.218(a)(13)]

On or about May 28, 2015, at the Department of Veterans Affairs Central Texas Health Care Facility, Western District of Texas, the Defendant,

LUIS G. FIGUEROA

did, carry a firearm, to wit: a Beretta Model 21A-22LR, serial number BES62224U, without having an official purpose, in violation of Title 38, Code of Federal Regulations, Section 1.218(a)(13).

COUNT FOUR [38 C.F.R. § 1.218(a)(13)]

On or about May 28, 2015, at the Department of Veterans Affairs Central Texas Health Care Facility, Western District of Texas, the Defendant,

LUIS G. FIGUEROA

did, carry a firearm, to wit: a Remington 12 gauge shotgun, without having an official purpose, in violation of Title 38, Code of Federal Regulations, Section 1.218(a)(13).

<u>COUNT FIVE</u> [18 U.S.C. § 7(3) & 13 and T.P.C. § 37.08]

On or about May 28, 2015, at the Department of Veterans Affairs Central Texas Health Care Facility, Western District of Texas, a place within the special maritime and territorial jurisdiction of the United States, the Defendant,

LUIS G. FIGUEROA

did, with intent to deceive, knowingly make a false statement, to wit: "I am medically retired from the Harris County Sheriff's Department and authorized to carry firearms on VA property," or words to that effect, such statement being material to a criminal investigation to a peace officer then conducting the investigation, in violation of Section 37.08 of the Texas Penal Code and Title 18, United States Code, Sections 7(3) and 13.

RICHARD L. DURBIN, JR. United States Attorney

J. PATRICK ROBINSON

Special Assistant U. S. Attorney